

**From:** [Bob Rosenberg](#)  
**To:** [Richard Keigwin/DC/USEPA/US@EPA](#)  
**Cc:** [John Hebert/DC/USEPA/US@EPA](#); [Neil Anderson/DC/USEPA/US@EPA](#); [Russell Wasem/DC/USEPA/US@EPA](#); [Laura Parsons/DC/USEPA/US@EPA](#)  
**Subject:** Follow-Up to Wednesday's Rodenticide Meeting  
**Date:** 09/25/2011 09:05 AM

---

Rick,

Thank you for taking time on Wednesday to meet with members of the Ad Hoc Rodenticide Stakeholder Work Group to discuss revisions to rodenticide labels. We very much appreciate the time and attention you, Neal, Rusty, John and Laura have devoted this matter.

We also appreciate your comments about the importance of identifying tradeoffs for increasing the distance beyond 50 feet so the new language meets the Agency's goal of better protecting non-target and secondary wildlife from rodenticide exposure. We were very cognizant of the need for such tradeoffs and it is the primary reason we included these provisions:

- Requiring ALL exterior bait stations to be tamper-resistant
- Mandating bait within tamper resistant bait stations to be secure
- Limiting the treatment of burrows to loose pellets or meal formulations to reduce the risk of rodents ejecting bait from burrows
- Language governing how and where baits are placed within burrows
- Prohibiting "preventative maintenance" or unjustified permanent baiting when treating sites beyond the restricted distance
- Calling for confirmation of active infestations before treating sites beyond the restricted distance
- Encouraging the management of conducive conditions
- Product stewardship, including outreach, training, educational materials and web sites

As you take your stab at developing a label modification, we encourage you to give strong weight to the new science (post 2008 mitigation release) that quantifies a 450 foot foraging range. We also request that you give weight to the PMRA's evaluation and determination that 100 meters (328 feet) is an appropriate distance. Also, by substituting "structures and transport vehicles" for "buildings" we cover many of the situations that both the Agency and the Ad Hoc Committee agree are exposed under the current label language.

In short and in closing, we believe our suggested changes - especially the trade off provisions - embrace integrated pest management principles and, more importantly, address aspects of protecting non-target wildlife on which the present language is silent.



We look forward to seeing your suggested language in the near future.

Bob

P.S. We intended to leave additional material documenting government, third-party auditor and other requirements to locate baits away from buildings. I'm on the road until Tuesday night, but can drop it off on Wednesday.



Bob Rosenberg  
Senior Vice President  
National Pest Management Association  
10460 North Street  
Fairfax, VA 22030  
direct dial: (571) 224-0388  
fax: (703) 352-3031  
mobile: (703) 945-5926